

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: :  
Debtor(s): Dennis M. Ellis : Case Number: 07-20618  
Movant: Bank of America Corporation : Chapter Number: 13  
Respondent: No Respondent(s) : Document No.  
: Hearing Date and Time:

**MOTION FOR THE RECOVERY OF UNCLAIMED FUNDS**

COMES NOW Bank of America Corporation, by and through its Attorney, Jardanian Josephs, Attorney at Law ("Movant") hereby petitions the Court for \$2,989.61, which is the sum of all monies being held in the registry of this court as unclaimed funds, which are due to Wilshire Credit Corp., creditor. A dividend check in the amount totaling \$2,989.61 was not negotiated by the creditor and the Trustee, pursuant to 11 U.S.C. Section 347(a), delivered the unclaimed funds to the Clerk, US Bankruptcy Court.

The creditor did not receive the dividend check in the above case for the following reason:

The original dividend check was sent to a Wilshire Credit Corp. at PO Box 8517, Portland, OR 97207.  
That address is no longer valid. The current address is listed below. The change in address may have  
prevented delivery of the original dividend check. Furthermore Wilshire Credit Corp. is a wholly owned  
subsidiary of Bank of America Corporation as evidenced by exhibit A.

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The claimant's current mailing address, phone and social security/tax identification number are:

Bank of America Corporation  
Karen Hartford Polk AVP; Recovery Solutions  
401 North Tryon Street NC1-021-03-40  
Charlotte, NC 28255  
Phone: 980-387-5985  
SSN/TIN: xx-xxx7665

Furthermore, Movant has no knowledge that this claim has been previously paid or that any party other than the claimant is entitled to these funds.

Dilks & Knopik, LLC has been appointed by Bank of America Corporation, claimant, as its Attorney-in-Fact who is duly authorized by the attached original Power of Attorney and supporting documentation to apply for these funds. Dilks & Knopik, LLC is acting through its Attorney, Jardanian Josephs, Attorney at Law, to recover these funds on behalf of Bank of America Corporation.

Movant now seeks to recover the funds from the Court's Registry. Wherefore, Movant prays that, upon proper notice to the U.S. Attorney's Office, the Court order that a check in the amount of **\$2,989.61** made payable to **Bank of America Corporation** c/o Dilks & Knopik, LLC, PO Box 2728, Issaquah, WA 98027 be issued from the Court's Registry.

Dated: January 26, 2011

Respectfully Submitted: /s/ Jardanian Josephs  
Jardanian Josephs, Esquire  
Pa. I.D. 88667  
PO Box 22144  
Pittsburgh, PA 15222-0144  
Ph: (412) 979-0552  
Fax: (412) 281-6009

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**CERTIFICATE OF SERVICE OF  
MOTION FOR THE RECOVERY OF UNCLAIMED FUNDS**

I, Jardanian Josephs, Attorney at Law, the undersigned, do declare that on January 26, 2011, I served the within Motion for the Recovery of Unclaimed Funds to the US Attorney listed below.

I further declare that I served a true and correct copy, with notice, of the within document to the following individual(s) as follows:

U.S. Attorney  
Western District of Pennsylvania  
US Post Office & Courthouse  
700 Grant St., Ste 400  
Pittsburgh, PA 15219

Office of the U.S. Trustee  
Liberty Center  
1001 Liberty Ave, Suite 970  
Pittsburgh, PA 15222

I declare, under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: January 26, 2011

Respectfully Submitted: /s/ Jardanian Josephs  
Jardanian Josephs, Esquire  
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